

DOCKET FILE COPY ORIGINAL

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In re Applications of	)	MM Docket No. 99-153
	)	
READING BROADCASTING, INC.	)	File No. BRCT-940407KF
	)	
For Renewal of License of	)	
Station WTVE(TV), Channel 51	)	
Reading, Pennsylvania	)	
	)	
and	)	
	)	
ADAMS COMMUNICATIONS CORPORATION	)	File No. BPCT-940630KG
	)	
For Construction Permit for a New	)	
Television Station to Operate on	)	
Channel 51, Reading, Pennsylvania	)	

ADAMS COMMUNICATIONS CORPORATION

PHASE II EXHIBITS

Adams Communications Corporation

Phase II Exhibits

TABLE OF CONTENTS

<u>Exhibit Number</u>	<u>Description</u>
49	Application (File No. BPTTL-891208ZI) of Micheal L. Parker for a construction permit for a low power television station in Los Angeles, California, filed December 8, 1989
50	Application for consent to the transfer of control of the licensee of Station KWBB(TV), San Francisco, California, filed March 2, 1989
51	Application (File No. BTCCT-910724KG) for consent to the transfer of control of the licensee of Station WHRC-TV, Norwell, Massachusetts, filed July 24, 1991
52	Application (File No. BTCCT-911113KH) for consent to the transfer of control of the licensee of Station WTVE(TV), Reading, Pennsylvania, filed November 13, 1991
53	Application (File No. BTCCT-920603KG) for consent to the transfer of control of the permittee of Station KVMD(TV), Twentynine Palms, California, filed June 3, 1992
54	Application (File No. BALIB-920810OM) for consent to the assignment of license of international broadcast Station KCBI, Dallas, Texas, filed August 10, 1992
55	Amendment (filed October 29, 1992) to application for consent to the assignment of license of international broadcast Station KCBI, Dallas, Texas
56	FCC Form A-378, reflecting grant of application for consent to the assignment of license of international broadcast Station KCBI, Dallas, Texas

Adams Communications Corporation  
Phase II Exhibits  
Table of Content (continued)

<u>Exhibit Number</u>	<u>Description</u>
57	Assignment of License/Transfer of Control Worksheet, reflecting staff review of application for consent to the assignment of license of international broadcast Station KCBI, Dallas, Texas
58	Letter, dated February 18, 1991, from R. Clark Wadlow to Micheal L. Parker
59	Statement, dated March 21, 1991, for services through February, 1991, rendered to Reading Broadcasting, Inc. by Sidley & Austin (includes Billing Memorandum/Time Detail)
60	Check, dated 10/26/92, payable to Brown, Nietert & Kaufman, on account of Reading Broadcasting, Inc., and ledger page from records of Brown, Nietert & Kaufman
61	Excerpt from Inland Empire Television's Reply to Exceptions, filed January 20, 1988, in <u>Religious Broadcasting Network</u>



**APPLICATION FOR AUTHORITY TO CONSTRUCT OR  
MAKE CHANGES IN A LOW POWER TV, TV TRANSLATOR OR TV BOOSTER STATION**

(Carefully read instructions before filling out form - RETURN ONLY FORM TO FCC)

For Commission Fee Use Only

FEE # 9400400

FEE TYPE: C

FEE AMT: 375.00

ID SEQ: 6

For Applicant Fee Use Only

Is a fee submitted with this application? ☒ Yes ☐ No

If No, indicate reason therefor (check one box):

☐ Nonfeeable application

Fee Exempt (See 47 C.F.R. Section 1.1112)

☐ Noncommercial educational licensee

☐ Governmental entity

**SECTION I - GENERAL INFORMATION**

For Commission Use Only

File No. BPTL-891208ZI

1. Name of Applicant

Micheal L. Parker

Address

22720 S. E. 410th Street

City

Enumclaw

State

WA

Zip Code

98022

Telephone No. (include area code)

(206) 825-1099

2. This application is for: (check one box)

☒ Low Power Television

☐ TV Translator

☐ TV Booster

(a) Proposed Channel No.	(b) Community to be served:	
68 (-)	City Los Angeles	State CA

(c) Check one of the following boxes:

☒ Application for **NEW** station

☐ **MAJOR** change in licensed facilities; call sign: .....

☐ **MINOR** change in licensed facilities; call sign: .....

☐ **MAJOR** modification of construction permit; call sign: .....

File No. of Construction Permit: .....

☐ **MINOR** modification of construction permit; call sign: .....

File No. of Construction Permit: .....

☐ **AMENDMENT** to pending application; Application file number: .....

**NOTE:** It is not necessary to use this form to amend a previously filed application. Should you do so, however, please submit only Sections I and VII and those other portions of the form that contain the amended information.

Federal Communications Commission

Docket No. MM-94-153 Exhibit No. 49

Presented by Adams

Disposition

Identified	<u>✓</u>
Received	<u>✓</u>
Rejected	<u>—</u>

Reporter John Del Pino

Date 6-12-08

## SECTION II - ENGINEERING DATA AND ANTENNA AND SITE INFORMATION

## 1. Facilities requested:

Output Channel No.	Transmitter Rated Power Output	Proposed Community(ies) to be served	
68	1.0 kilowatts	City Los Angeles	State CA

## Frequency Offset (check one)

☐ No offset      ☐ Zero offset      ☐ Plus offset      ☒ Minus offset

Translator Input Channel No. N.A.

## 2. Proposed transmitting antenna location:

City Los Angeles	State CA	County Los Angeles
Address or other description of location: Round Top Drive		Geographical coordinates of transmitting antenna to nearest second North Latitude      West Longitude <u>34° 08' 14"</u> <u>118° 13' 36"</u>

Attach as an Exhibit a map or maps (preferably topographic, if obtainable, such as Geological Survey quadrangles) of the area of the proposed transmitting antenna location shown drawn thereon the following data:

Exhibit No.  
E/ Fig. 1

- a. Scale of kilometers  
b. Proposed transmitting antenna location accurately plotted.

3. Transmitter:	Make TTC	Type No. XL1000UU	Output Power P 1.0 kilowatts
4. Transmission line:	Andrew Corp.	HJ7-50A	Length 280' Rated efficiency E for length given (decimal fraction) 0.678

5. Transmitting antenna ☒ Directional "off-the-shelf"      ☐ Directional Composite (Multiple Antennas)      ☐ Non-Directional

Manufacturer Bogner		Model B24UA		Description <sup>1</sup> Low Power Slot Antenna
Orientation of main lobe <sup>2</sup> N 200° E	Overall antenna structure height above ground <sup>3</sup> 93 meters	Elevation of Site <sup>4</sup> 268 meters	Power gain G (multiplier) in the horizontal lobe of maximum radiation relative to a halfwave dipole <sup>5</sup> 45.1	

Effective radiated power (ERP)  
(ERP=P X E X G) 30.6 kilowatts

Height of antenna radiation center above ground 86 meters  
Height of antenna radiation center above above mean sea level 354 meters<sup>6</sup>

1 Give basic type using general descriptive terms such as half-wave dipole, "bow-tie" with screen, corner reflector, 10 element Yagi, 4 element in-phase array, two stacked 5 element Yagis, etc.

2 For directional antennas in the horizontal plane show the direction of the main radiation lobe(s) in degrees with respect to true north in a 360 degree horizontal azimuth, numbered clockwise, with true north as zero azimuth.

3 Show overall height above ground in meters to topmost portion of structure, including highest top mounted antenna and beacon if any.

4 Show the ground elevation above mean sea level in meters at the base of the transmitting antenna supporting structure.

5 Give the actual power gain toward the radio horizon.

6 This is equal to the sum of the site elevation and the height of the antenna radiation center above ground.

6. Attach as an Exhibit a vertical plan sketch for the proposed total antenna structure, including supporting structure, giving overall height of structure in meters above ground, including lighting beacon (if any).

Exhibit No.  
E/Fig.2

7. Will the proposed antenna supporting structure be shared with an AM radio station?

☐ Yes ☒ No

If yes, list the call sign of that station. \_\_\_\_\_

8. Attach as an Exhibit a polar diagram of the radiation pattern (relative field) in the horizontal plane of the transmitting antenna showing clearly the correct relationship between the major lobe or lobes and the minor lobes of radiation and a tabulation of the pattern at every ten degrees and all maxima and minima. Applicants proposing use of multiple transmitting antennas shall submit a composite radiation pattern. If a non-directional transmitting antenna will be employed, i.e., an antenna with an approximately circular radiation pattern, check here ☐ and omit polar diagram and tabulation. If the antenna manufacturer and model number are on the Commission's list of common "off-the-shelf" directional antennas, check here ☐ and omit polar diagram and tabulation.

Exhibit No.  
E/Fig.3

9. Has FAA been notified of proposed construction?

☐ Yes ☒ No

If Yes, give date and office where notice was filed: No change proposed in existing tower height

10. Environmental Statement (See 47 C.F.R. Section 1.1301 et seq.)

Would a Commission grant of this application come within 47 C.F.R. 1.1307, such that it may have a significant environmental impact, including exposure to workers or the general public to harmful nonionizing radiation levels?

☐ Yes ☒ No

If you answer Yes, submit as an Exhibit an Environmental Assessment as required by Section 1.1311. If no, explain briefly why not. Exhibit E

Exhibit No.

11. Unattended operation:

Is unattended operation proposed?

☒ Yes ☐ No

If Yes, and this application is for authority to construct a new station or to make changes in the facilities of an authorized station which proposes unattended operation for the first time, applicant will comply with the requirements of 47 C.F.R. Section 74.734 concerning unattended operation.

☒ Yes ☐ No

12. Is type approved broadcast equipment being specified?

☒ Yes ☐ No

If No, indicate date equipment was submitted to FCC Laboratory for approval. \_\_\_\_\_

I certify that I represent the applicant in the capacity indicated below and that I have examined the foregoing statement of technical information and that it is true to the best of my knowledge and belief.

December 6, 1989

Date

Signature

*Alvin H. Andrus*

Typed or Printed Name Andrus and Associates, Inc.  
By Alvin H. Andrus

Telephone No. (include area code)  
301/384-5374

☐ Technical Director

☒ Registered Professional Engineer

☒ Consulting Engineer

☐ Chief Operator

☐ Other (specify)



# SECTION III - LEGAL QUALIFICATIONS

NOTE: Applicants for new stations only:

1. Applicant is (check one of the following):

- ☒ Individual ☐ General Partnership ☐ Corporation  
☐ Other ☐ Limited Partnership ☐ Unincorporated Association

(a) If the applicant is a legal entity other than an individual, partnership, corporation or unincorporated association, describe in an Exhibit the nature of the applicant.

Exhibit No.  
N/A

(b) For LPTV and TV translator applicants only:

If the applicant is an individual, submit as an Exhibit the applicant's name, address and telephone number (including area code).

Exhibit No.  
I

If the applicant is a partnership, whether general or limited, submitted as an Exhibit the names, addresses, and telephone numbers (including area code) of all general and limited partners (including silent partners), and the nature and percentage of the ownership interest of each partner.

Exhibit No.  
N/A

If the applicant is a corporation or an unincorporated association, submit as an Exhibit the names, addresses and telephone numbers (including area code) of all officers, directors and other members of the governing board of the corporation or association and the nature and the percentage of their ownership interests in the applicant (including stockholders with interests of 1% or greater).

Exhibit No.  
N/A

2. For LPTV and TV translator applicants only, submit as an Exhibit a list of all other new applications filed during the same window period as this application in which the applicant or any principal of the applicant has any interest. Include the percentage of that interest for each listed application, as well as the other applicant's name (if different) and the channel number and location of the proposed station.

Exhibit No.  
I

NOTE: No more than five (5) applications for new low power TV or TV translator stations may be filed during a single window period by any applicant, or by any individual or entity having an interest of 1% or more in applications filed in the same window period. This limit does not apply to minor or major change applications or to TV booster applications.

## CITIZENSHIP AND OTHER STATUTORY REQUIREMENTS

3. (a) Is the applicant in compliance with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments?

☒ Yes ☐ No

(b) Will any funds, credit, or other financial assistance for the construction, purchase or operation of the station(s) be provided by aliens, foreign entities, domestic entities controlled by aliens, or their agents?

☐ Yes ☒ No

If Yes, provide particulars as an Exhibit.

Exhibit No.

4. (a) Has an adverse finding been made, or an adverse final action taken by any court or administrative body as to the applicant or any party to this application in a civil or criminal proceeding brought under the provisions of any law related to the following: any felony; broadcast-related antitrust or unfair competition; criminal fraud or fraud before another governmental unit; or discrimination?

☐ Yes ☒ No

(b) Is there now pending in any court or administrative body any proceeding involving any of the matters referred to in 4(a)?

☐ Yes ☒ No

If the answer to 4(a) or 4(b) is Yes, attach as an Exhibit a full disclosure concerning the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), a statement of the facts upon which the proceeding was based or the nature of the offense alleged or committed, and a description of the current status or disposition of the matter.

Exhibit No.

SECTION III (Page 2)

5. Has the applicant or any other party to this application had any interest in:

(a) a broadcast application which has been dismissed with prejudice by the Commission?

☒ Yes ☐ No

(b) a broadcast application which has been denied by the Commission?

☒ Yes ☐ No

(c) a broadcast station, the license for which has been revoked?

☐ Yes ☒ No

(d) a broadcast application in any Commission proceeding which left unresolved character issues against the applicant?

☐ Yes ☒ No

If the answer to any of the questions in 5 is Yes, state in an Exhibit the following:

(i) Name of party having interest;

(ii) Nature of interest or connection, giving dates;

(iii) Call letters of stations or file number of application or docket number;

(iv) Location.

Exhibit No.  
II

MULTIPLE APPLICATIONS

6. The applicant certifies that there is no other application pending that would be directly mutually exclusive with this application in which this applicant has an interest of one percent or more or in which any party to this application is an officer, director, or has an interest of one percent or more, direct or indirect.

☒ Yes ☐ No

If No, this application cannot be accepted for filing.

REAL PARTY IN INTEREST

7. The applicant certifies that no agreement, either explicit or implicit, has been entered into for the purposes of transferring or assigning to another party, any station construction permit or license or interest therein that is awarded as a result of a random selection or lottery.

☒ Yes ☐ No

If No, this application cannot be accepted for filing.

SECTION IV - PROGRAM SERVICE STATEMENT

NOTE: For Low Power Television applicants only:

Low Power Television stations must offer a broadcast program service; a non-program broadcast service will not be permitted. Therefore, briefly describe below, in narrative form, your planned programming service.

The applicant will provide a program service of educational, informational, entertainment and other programming to serve the needs of the Los Angeles area.

f

## SECTION V - PREFERENCES

NOTE: Read the following material carefully before answering the questions.

1. All applicants for construction permits for new television translator stations, low power television stations and television booster stations, or for major changes in existing stations, must complete this section. Many pending proposals would create objectionable interference to other nearby proposals if all were granted and are considered mutually exclusive because only one can be granted. The winner from among mutually exclusive applicants will be selected by a lottery. In conducting a lottery, the law requires that certain preferences be awarded to encourage diversity in the ownership of mass communications media and minority ownership. An applicant with preferences will have a greater probability of winning the lottery than an applicant lacking them. Preferences will be computed by the Commission, in the manner described in 47 C.F.R. Section 1.1623.
2. It is essential that information about preferences be completely accurate so that the purposes of the law can be carried out and the lottery conducted fairly. You should, therefore, read very carefully the definitions set out below before answering the questions. WINNING APPLICANTS PROVED TO HAVE MADE MISREPRESENTATIONS TO THE COMMISSION TO IMPROVE THEIR CHANCES IN THE LOTTERY WILL BE DISQUALIFIED FROM HOLDING THAT AUTHORIZATION AND MAY ALSO JEOPARDIZE OTHER PENDING APPLICATIONS.

### MINORITY PREFERENCE

1. "Minority" means a person who is a member of one of the following groups: Blacks, Hispanics, American Indians, Alaska Natives, Asians and Pacific Islanders. No other groups are recognized for the purposes of the lottery.
2. If the applicant is a sole proprietor, a preference will be awarded if the applicant is a minority.
3. Other entities will be entitled to a minority preference as follows:
  - a. **Partnerships.** If a majority of the partnership (computed on the basis of profits) is in the hands of a minority, the applicant is entitled to a preference. Note that limited or "silent" partners are to be included in determining whether a preference may be claimed. Thus, in a five-person limited partnership in which each partner is entitled to 20 percent of the profits, the partnership is eligible for a minority preference if any three partners (including three limited partners) are minorities.
  - b. **Trusts.** If a majority of the beneficial interests are held by minorities, the trust is entitled to a minority preference. The characteristics of trustee are not considered.
  - c. **Unincorporated associations or nonstock corporations with members.** If a majority of the members are minorities, the entity is entitled to a minority preference.
  - d. **Unincorporated associations or nonstock corporations without members.** If a majority of the governing board (including executive boards, boards of regents, commissions and similar governmental bodies where each board member has one vote) are minorities, the entity is entitled to a minority preference.
  - e. **Stock corporations.** If a majority of the voting shares are held by minorities, the corporation is entitled to a minority preference.
  - f. Where one form of entity owns an interest in a different form (e.g., a corporation owns 20 percent of a partnership), the interest owned, in its entirety, follows the characteristics of the owner. Thus, in the example, if 51 percent of the corporation's stock is voted by minorities, its entire 20 percent interest in the partnership would be considered as minority controlled when determining whether the partnership is eligible for a minority preference.

# DIVERSIFICATION PREFERENCES

1. In general terms, a preference will be given to an applicant if it and/or its owners have no recognizable interest (more than 50 percent) in the aggregate, in any other media of mass communications. A smaller preference will be given to an applicant if it and/or its owners, in the aggregate, have a recognizable interest in no more than three mass media facilities. No preference is given, however, if any of the commonly owned mass media outlets serves the same area as the proposed station, or if the applicant and/or its owners have more than three mass media facilities. The material that follows will set out in more detail the meaning of "own," "owner," "media of mass communications," and "serves the same area."
2. If an applicant and/or its owners, in the aggregate, do not own any other media of mass communications, the applicant is entitled to a preference. "Own" in this context means more than 50 percent ownership.
3. "Owner" means: the applicant, in the case of a sole proprietor; partner, including limited or "silent" partners, in the case of a partnership; the beneficiaries, in the case of a trust; any member, in the case of a nonstock corporation or unincorporated association with members; any member of the governing board (including executive boards, boards of regents, commissions, or similar governmental bodies where each member has one vote), in the case of nonstock corporation or unincorporated association without members; and owners of voting shares, in the case of stock corporations. For the purposes of the diversification preference, holders of less than one percent of any of the above interests will not be considered.
4. A medium of mass communications means:
  - a. a daily newspaper; or
  - b. license or construction permit for:
    - (1) a television station, including low power and television translator station;
    - (2) an AM or FM radio broadcast station;
    - (3) a direct broadcast satellite transponder;
    - (4) a cable television system; or
    - (5) a multipoint distribution service station.
5. The diversity preference is not available to applicants that control, or whose owners control, in the aggregate, more than 50 percent of other media of mass communications in the same area. The facilities will be considered in the "same area" if the following defined areas wholly encompass or are encompassed by the protected, predicted contour of the proposed low power television, television translator or television booster station. (See Section 74.707(a)):
  - a. AM broadcast station-predicted or measured 2 mV/m groundwave contour (see Sections 73.183 or 73.186);
  - b. FM broadcast station-predicted 1.0 mV/m contour (see Section 73.313);
  - c. Television broadcast station-Grade A contour (see Section 73.684);
  - d. Low power television or television translator station-the predicted, protected contour (see Section 74.707(a));
  - e. Cable television system-the franchised community of a cable system;
  - f. Daily newspaper-community of publication; and
  - g. Multipoint Distribution Service-station service area (see Section 21.902(d)).
6. No diversity preference is available to an applicant whose proposed transmitter site is located within the franchise area of a cable system controlled (owned more than 50 percent) by the applicant and/or its owners. No diversity preference is available to an applicant whose proposed transmitter site is located within the community of publication of a daily newspaper controlled (owned more than 50 percent) by the applicant and/or its owners.
7. If an applicant and/or the owners of the applicant control no more than three other mass media facilities, none of which serve the same area as the proposed station, the applicant will be entitled to a smaller preference than an applicant with no other media facilities.

F

SECTION V - (Page 3)

REMINDER: Do not complete the following without reading carefully the definitions and other information set out in the foregoing pages.

CERTIFICATION OF PREFERENCES

MINORITY

1. The applicant certifies that it is entitled to and seeks to claim minority preference.

☐ Yes ☒ No

If yes, complete the following:

Name	Address	Percentage Interest in the applicant	Minority Group
------	---------	---	----------------

DIVERSIFICATION PREFERENCE

2. The applicant certifies that it and/or its owners have no interest, in the aggregate, exceeding 50 percent in any media of mass communications.

☒ Yes ☐ No

If Yes, DO NOT respond to questions 3 and 4.

3. The applicant certifies that it and/or its owners have no interest, in the aggregate, exceeding 50 percent in more than three mass communications media facilities.

☐ Yes ☐ No

4. The applicant certifies that it and/or its owners have no interest, in the aggregate, exceeding 50 percent in a media of mass communications in the same area to be served by the proposed station.

☐ Yes ☐ No

## SECTION VI - EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

1. For Low Power TV applicants, will this station employ on a full-time basis five or more persons?

☐ Yes ☒ No

If Yes, the applicant must include an EEO program called for in the separate Broadcast Equal Employment Opportunity Report (FCC Form 398-A).

## SECTION VII - CERTIFICATIONS

1. For new station and major change applicants only, the applicant certifies that it has or will comply with the public notice requirement of 47 C.F.R. Section 73.3580(g).

☒ Yes ☐ No

2. For applicants proposing translator rebroadcasts who are not the licensee of the primary station, the applicant certifies that written authority has been obtained from the licensee of the station whose programs are to be retransmitted.

N/A ☐ Yes ☐ No

Primary station proposed to be rebroadcast:

Call Sign	City	State	Channel No.

3. The applicant certifies that it has contacted an authorized spokesperson for the owner of the rights to the proposed transmitter site and has obtained reasonable assurance that the site will be available for its use if this application is granted.

☒ Yes ☐ No

That person can be contacted at the following address and telephone number:

Name Joseph H. Shackelford		Mailing Address or Identification 730 E. Broadway	
City Glendale	State CA	ZIP Code 91205	Telephone No. (include area code) (213) 245-7575

The APPLICANT hereby waives any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

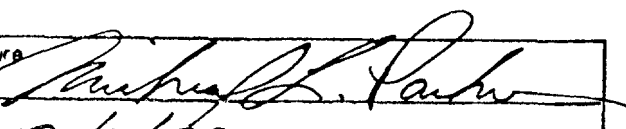
The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations, and that all exhibits are a material part hereof and incorporated herein.

The APPLICANT represents that this application is not filed for the purpose of impeding, obstructing, or delaying determination on any other application with which it may be in conflict.

In accordance with 47 C.F.R. Section 1.65, the APPLICANT has a continuing obligation to advise the Commission, through amendments, or any substantial and significant changes in information furnished.

**WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.  
U.S. CODE, TITLE 18, SECTION 1001.**

I certify that the statements in this application are true, complete and correct to the best of my knowledge and belief, and are made in good faith.

Name of Applicant Micheal L. Parker	Signature 
Title N/A	Date 12/7/89

Micheal L. Parker  
FCC Form 346

EXHIBIT I

Micheal L. Parker  
22720 S. E. 410th Street  
Enumclaw, WA 98022  
(206) 825-1099

Micheal L. Parker is a Vice President and Director of West Coast United Broadcasting Co., which, in a separate application being filed on this date, is an applicant for a new low power television on Channel 66 at San Francisco, California. He holds no equity interest in West Coast United Broadcasting Co.

EXHIBIT II

Micheal L. Parker held jointly with his wife, Judith Parker, a stock interest in Pacific Rim Broadcasting Co., which was an applicant for a construction permit to modify its construction permit for KPRR-TV, Channel 14, Honolulu, Hawaii, to operate on Channel 5, FCC File No. BMPCT-830223KO, MM Docket No. 83-734. The application was dismissed by the Commission with prejudice effective March 12, 1984 pursuant to request by Pacific Rim Broadcasting Co. See Memorandum Opinion and Order, FCC 84M-1202, released March 12, 1984. An application of Micheal Parker for a new commercial television station on Channel 29 at Sacramento, California, FCC File No. BPCT-820824KJ, MM Docket No. 83-66, was dismissed with prejudice effective May 17, 1983 pursuant to request by Mr. Parker. See Memorandum Opinion and Order, FCC 83M-1594, released May 17, 1983. In addition, Micheal Parker is an officer, director, and shareholder of Mt. Baker Broadcasting Co., which was denied an application for extension of time of its construction permit for KORC(TV), Anacortes, Washington, FCC File No. BMPCT-860701KP. See Memorandum Opinion and Order, FCC 88-234, released August 5, 1988. Mt. Baker Broadcasting Co. has pending before the Commission a Petition for Reconsideration of that decision.



EXHIBIT III

The applicant seeks a waiver of Section 74.705 of the Commission's Rules as may be necessary with respect to protection of full power television stations. The applicant seeks to operate on a channel allotted to Los Angeles upon which a full power television station has heretofore been authorized. Section 74.705 could, in some instances, anomalously require greater protection from the proposed low power station than that required for a full power station under the Commission's rules. A waiver of the low power rules as necessary to allow the proposed station to provide only the protection necessary for a full power station will permit the applicant to initiate service to the Los Angeles market on Channel 68 pending resolution of current proceedings and the Commission's current "freeze" on new full power UHF television applications.

EXHIBIT E  
ENGINEERING STATEMENT  
IN SUPPORT OF  
APPLICATION FOR CONSTRUCTION PERMIT  
LOW POWER TELEVISION STATION  
ON BEHALF OF  
MICHEAL L. PARKER  
LOS ANGELES, CALIFORNIA  
DECEMBER 1989

ANDRUS AND ASSOCIATES, INC.

CONSULTING ENGINEERS

ADAMS COMM. CORP.  
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Low Power Television Channel 68  
Los Angeles, California  
December 1989

Exhibit E - Text

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Figure 1	-	Map Showing Transmitting Antenna Location
Figure 2	-	Vertical Tower Sketch
Figure 3	-	Proposed Horizontal Directional Relative Field Pattern
Figure 4	-	Map Showing Protected 74 dBu Contour
Figure 5	-	Proposed Vertical Relative Field Pattern
Figure 6	-	RF Power Density Grid

EXHIBIT E  
ENGINEERING STATEMENT  
IN SUPPORT OF  
APPLICATION FOR CONSTRUCTION PERMIT  
LOW POWER TELEVISION STATION  
ON BEHALF OF  
MICHEAL L. PARKER  
LOS ANGELES, CALIFORNIA  
DECEMBER 1989

This Engineering Statement was prepared by Alvin H. Andrus, Broadcast Consulting Engineer, President and employee of Andrus and Associates, Inc., with offices at 351 Scott Drive, Silver Spring, Maryland 20904.

This Engineering Statement was prepared on behalf of Micheal L. Parker in support of an application for construction permit for a Low Power Television facility on UHF-TV Channel 68, Los Angeles, California.

UHF-TV Channel 68 is allotted to Los Angeles, California in Section 73.606, Table of Allotments, of the FCC Rules. A modified construction permit was issued to Black Television Workshop of Los Angeles, Inc. ("BTW") to operate with 871 kW (DA) at an effective antenna height of 2884 ft. (879 meters). BTW, the holder of that construction permit, operated the station, KEEF-TV, pursuant to automatic program test authority. However, while the station's application for covering license was pending the station was ordered off the air on August 8, 1987 by the Mass Media Bureau for unauthorized construction. The station is currently not authorized to engage in any temporary operations, pending

resolution of issues of control of the licensee. See Memorandum Opinion and Order, 4 FCC Rcd 3871 (1989). The various pending applications of BTW and an order to show cause why the KEEF-TV construction permit should not be revoked are pending in an ongoing hearing proceeding, id., which may result in revocation of BTW's construction permit. By the terms of the Commission's current freeze on new full-power applications for UHF television channels, which includes the Los Angeles market, applications for a new, permanent operator of a full power facility cannot be accepted. Accordingly, by this application, Micheal L. Parker, seeks authority to construct a new low power television station on Channel 68 at Los Angeles to provide service on a permanent basis to the market.

This application proposes to operate on Channel 68 with negative offset as a low power television facility from an existing tower located near Round Top Drive, Los Angeles, California. The tower was formerly used by an FM station.

The applicant proposes to operate with a transmitter output power of 1 kW into a Bogner B24UA directional transmitting antenna, with the center of the maximum lobe oriented at a bearing of N 200° E. The antenna will incorporate 0.5 degrees electrical beam tilt. The antenna will be side-mounted near the top of the existing tower.

Exhibit III refers to Section 74.705 of the FCC Rules.

Figure 1 is a portion of a USGS topographic map showing the existing antenna location.

Figure 2 is a vertical tower sketch showing the overall dimensions of the existing tower and the center of radiation of the proposed Channel 68 LPTV antenna.

Table I is a tabulation of the proposed directional antenna relative field and radiated power values.

Figure 3 is the proposed horizontal directional relative field pattern for the Bogner B24UA directional transmitting antenna. The zero degree reference shown on the polar plot will be oriented to a true bearing of N 200° E.

Figure 4 is a map showing the protected 74 dBu contour of the proposed Channel 68 LPTV facility. The 3 to 16 km average elevations were obtained from the National Geophysical Data Center thirty second point topography data base. Table II is a tabulation of the information used to establish the distances to the protected 74 dBu contour of the proposed LPTV facility.

It is believed that this application will not have a significant environmental impact, as defined in Section 1.1307 of the FCC Rules.

The proposed LPTV antenna will be side-mounted on an existing tower structure.

The American National Standards Institute specifies a maximum recommended power density of  $2650 \text{ uW/cm}^2$  for exposure on UHF-TV Channel 68.


Figure 5 is the proposed vertical relative field pattern for the LPTV antenna.

Figure 6 is an RF power density grid showing the calculated power density values at 2 meters above the ground elevation in the vicinity of the transmitting tower from the proposed LPTV facility on Channel 68.

The vertical relative field pattern shown in Figure 5 was used to establish the actual radiation at the pertinent vertical angles. A minimum relative field of 10% was used if the theoretical vertical pattern relative field was less than 10% of the maximum relative field at 0.5 degrees below the horizontal.

As shown in Figure 6, the maximum power density, from the LPTV antenna at 2 meters above ground level, is  $3 \text{ uW/cm}^2$  which is insignificant as compared to the ANSI recommended maximum power density ( $2650 \text{ uW/cm}^2$ ). The power density values shown on Figure 6 were calculated assuming uniform radiation in the horizontal plane, therefore, the actual calculated power density values to the North of the tower will be significantly lower than shown on Figure 6.

Respectfully Submitted

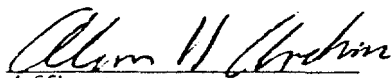
  
Alvin H. Andrus, P.E.



State of Maryland                    )  
  ) SS:  
County of Montgomery            )

Alvin H. Andrus, being duly sworn, deposes and says that he is a broadcast consulting engineer, President and an employee of Andrus and Associates, Inc., with offices at 351 Scott Drive, Silver Spring, Maryland 20904; that he is a graduate electrical engineer of the Massachusetts Institute of Technology; that his qualifications are on file with the Federal Communications Commission and that he is a registered Professional Engineer in the State of Maryland (No.5136) and in the District of Columbia (No.4723).

Affiant states that all statements made in this report are true of his own knowledge except where stated to be on information or belief and those statements he believes to be true.

  
Affiant

Subscribed and sworn to before me this 6th day of December, 1989

  
Notary Public

My Commission expires 7/1/90

Table I  
Proposed Directional Antenna  
Relative Field and Radiated Power Values  
Bogner B24UA Antenna  
Proposed Low Power Television  
Los Angeles, California  
December 1989

<u>Polar Plot (Deg.)</u>	<u>True Bearing (Deg.)</u>	<u>Relative Field</u>	<u>Radiated Power</u>		<u>Polar Plot (Deg.)</u>	<u>True Bearing (Deg.)</u>	<u>Relative Field</u>	<u>Radiated Power</u>	
			<u>(kW)</u>	<u>(dBk)</u>				<u>(kW)</u>	<u>(dB)</u>
0	200	1.0*	30.6	14.9	180	20	0.23	1.6	2.1
10	210	0.98	29.4	14.7	190	30	0.22	1.5	1.7
20	220	0.96	28.2	14.5	200	40	0.21**	1.3	1.3
25	225	0.945	27.3	14.4	205	45	0.22	1.5	1.7
30	230	0.93	26.5	14.2	210	50	0.23	1.6	2.1
40	240	0.93	26.5	14.2	220	60	0.35	3.7	5.7
50	250	0.94	27.0	14.3	230	70	0.47	6.8	8.5
60	260	0.97	28.8	14.6	240	80	0.63	12.1	10.6
70	270	0.99	30.0	14.8	250	90	0.77	18.1	12.3
80	280	0.98	29.4	14.7	260	100	0.87	23.2	13.4
90	290	0.95	27.6	14.4	270	110	0.95	27.6	14.4
100	300	0.87	23.2	13.6	280	120	0.98	29.4	14.5
110	310	0.77	18.1	12.6	290	130	0.99	30.0	14.5
115	315	0.70	15.0	11.8	295	135	0.98	29.4	14.5
120	320	0.63	12.1	10.8	300	140	0.97	28.8	14.5
130	330	0.47	6.8	8.3	310	150	0.94	27.0	14.5
140	340	0.35	3.7	5.7	320	160	0.93	26.5	14.5
150	350	0.23	1.6	2.1	330	170	0.93	26.5	14.5
160	0	0.21**	1.3	1.3	340	180	0.96	28.2	14.5
170	10	0.22	1.5	1.7	350	190	0.98	29.4	14.5

\* Maximum Radiation

\*\* Minimum Radiation

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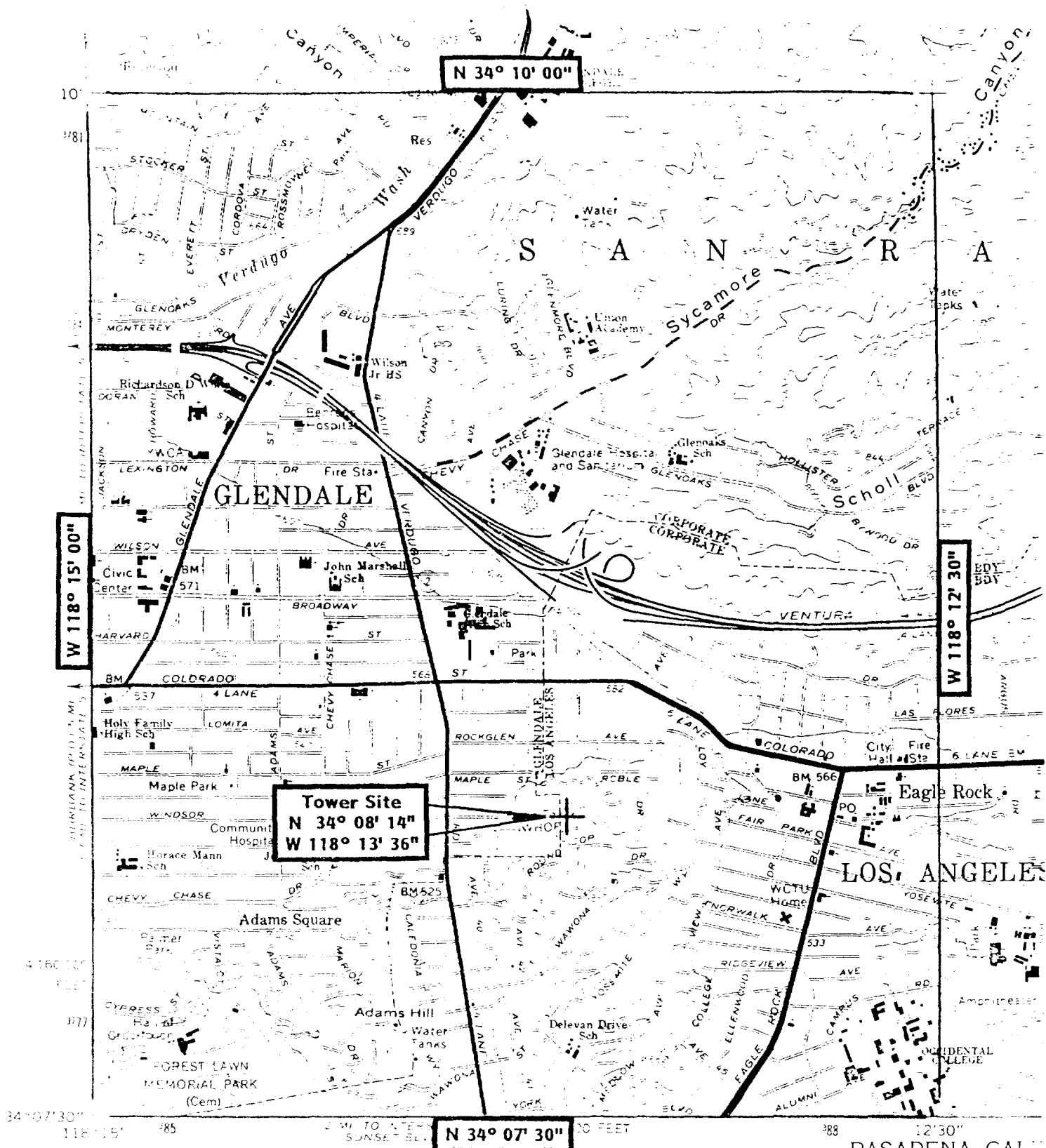
Table II  
LPTV Ch. 68(-) 30.6 kW (DA-Max.) Visual ERP  
Micheal L. Parker  
Los Angeles, California  
December 1989

SITE: N 34 DEG. 8 MIN. 14 SEC.  
W 118 DEG. 13 MIN. 36 SEC.

Center of Radiation = 354.2 Meters amsl. (1162 Ft. amsl.)

Bearing (Degrees)	Average Elevation Meters (Ft.)	Effective Elevation Meters (Ft.)	Radiated Power (dBk)	Depression Angle (Degrees)	74 dBu KM (Miles)
0	630.3 (2068)	-276.1 (-906)	1.3	-.4605	4.9 (3.1)
45	673.3 (2209)	-319.1(-1047)	1.7	-.4951	5 (3.1)
90	214.3 (703)	139.9 (459)	12.58	.3278	19.9 (12.4)
135	153.6 (504)	200.6 (658)	14.68	.3925	26.2 (16.3)
180	97.2 (319)	256.9 (843)	14.5	.4442	29.1 (18.1)
225	88.4 (290)	265.8 (872)	14.61	.4518	29.7 (18.5)
270	246 (807)	108.2 (355)	14.77	.2883	19.8 (12.3)
315	318.5 (1045)	35.7 (117)	11.76	.1655	9.8 (6.1)
Average =	302.7 (993.1)	51.5 (168.9)			

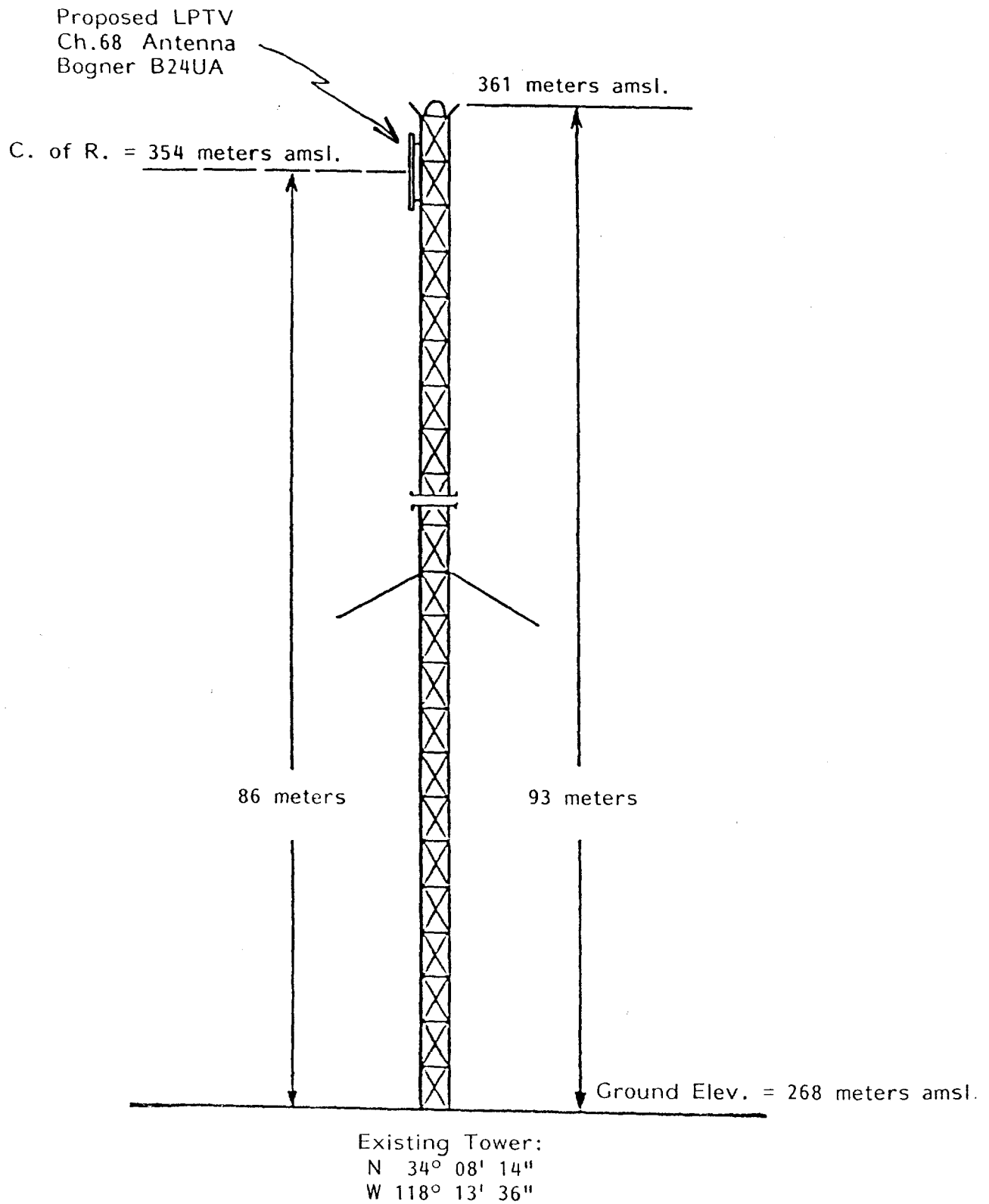
Distances to contours based upon FCC F(50,50) curves for Channels 14-69.



**Figure 1**  
**Proposed Transmitting Antenna Location**  
 LPTV Ch. 68(-) 30.6 kW (DA-Max.) Visual ERP  
 Micheal L. Parker  
 Los Angeles, California  
 December 1989

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 Silver Spring, Md. 20904

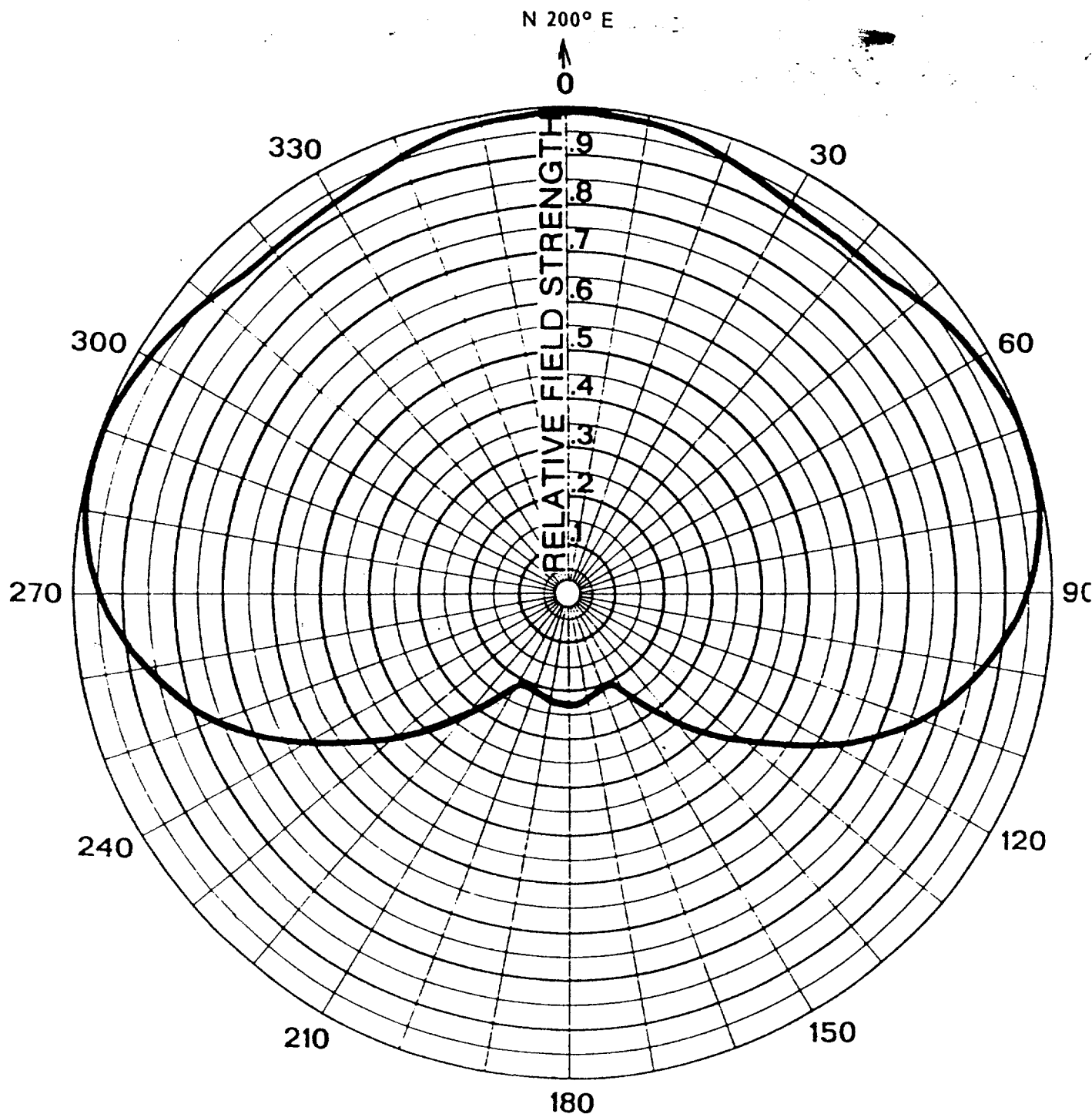
1966  
 PHOTO REPRODUCED 1977  
 AMS 2352 II NW-SERIES 1.1



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Figure 2  
Vertical Tower Sketch  
LPTV Ch. 68(-) 30.6 kW (DA-Max.) Visual ERP  
Micheal L. Parker  
Los Angeles, California  
December 1999

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**Figure 3**  
**Proposed Horizontal Relative Field Pattern**  
**LPTV Ch. 68(-) 30.6 kW (DA-Max.) Visual ERP**  
**Micheal L. Parker**  
**Los Angeles, California**  
**Decem**

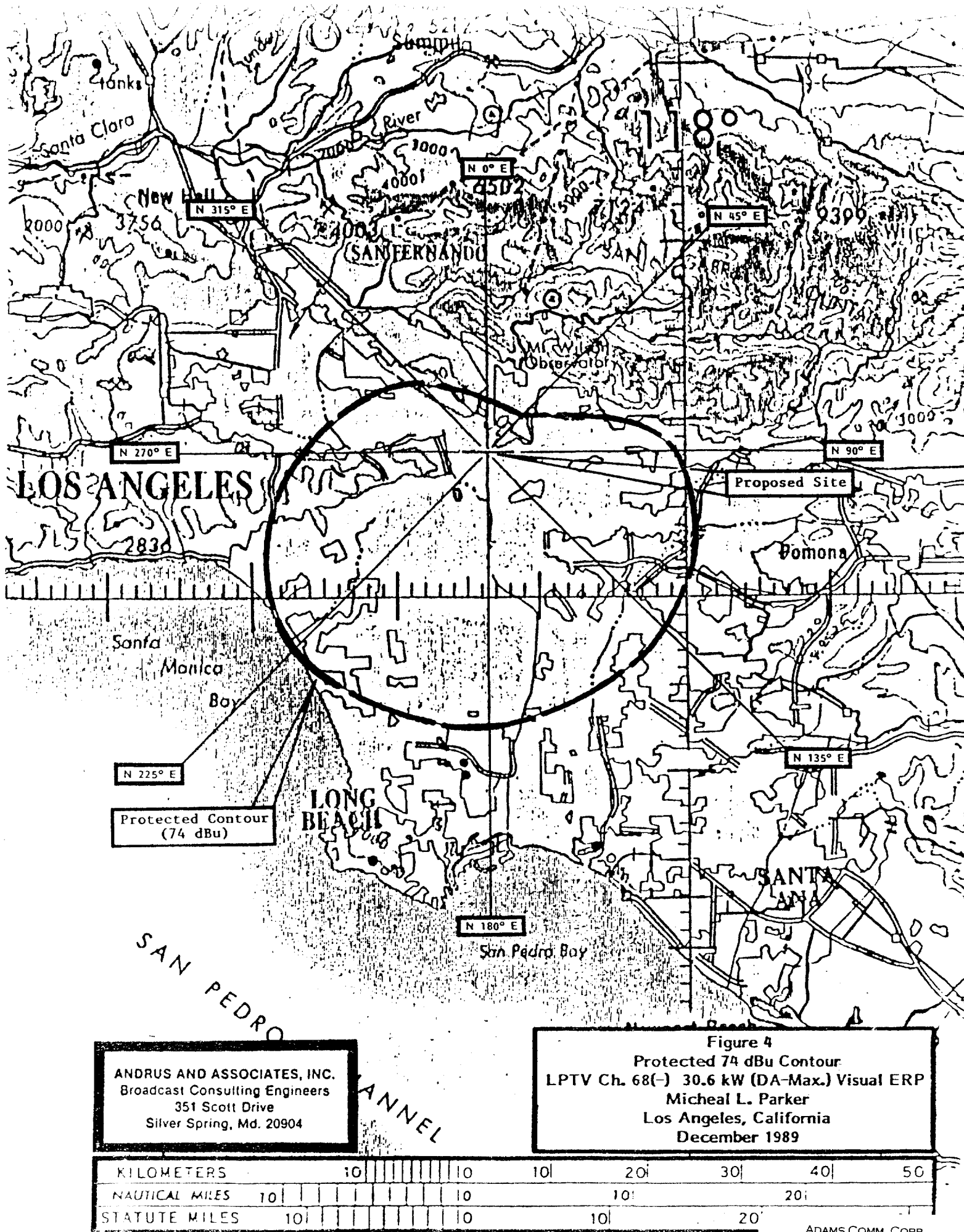
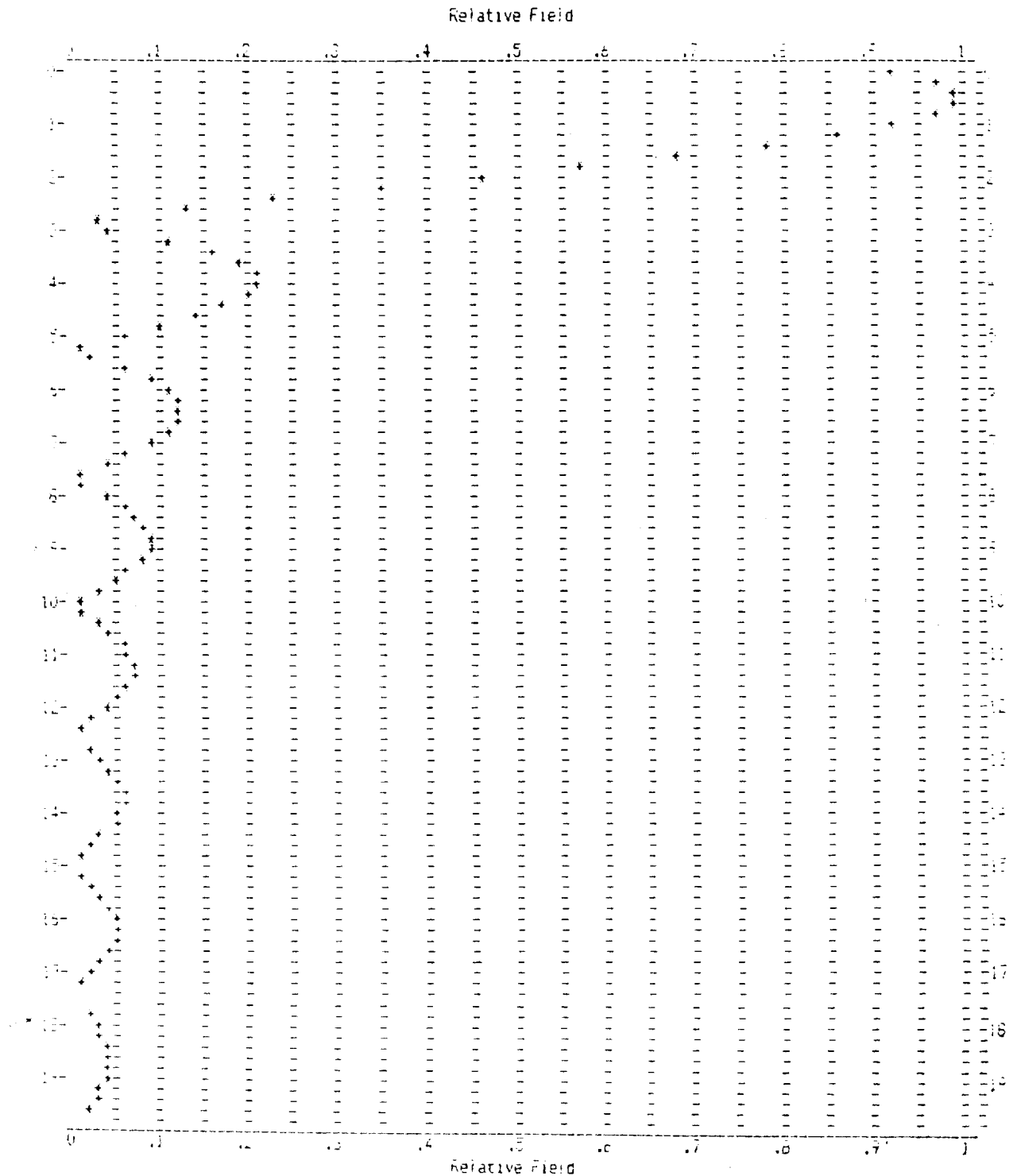


Figure 5  
 Proposed Vertical Relative Field Pattern  
 LPTV Ch. 68(-) 30.6 kW (DA-Max.) Visual ERP  
 Micheal L. Parker  
 Los Angeles, California  
 December 1989

60GNER E240A



Note: vertical scale in degrees below horizontal.

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**Figure 6**  
**R.F. Power Density Grid**  
**LPTV Ch. 68(-) 30.6 kW (DA-Max.) Visual ERP**  
**Micheal L. Parker**  
**Los Angeles, California**  
**December 1989**

Program calculates Power Density using Formulas (4) and (5) for FM and TV antennas, Section II, D.S.T. Bulletin # 650

Elevation of Power Density Calculations = 270 Meters AMSL.

LPTV LOS ANGELES CH. 68

Tower Location is 12 Units or 120 Meters from Left Side of Grid.

Tower Location is 12 Units or 120 Meters from Top of Grid.

Antenna Type BOGNER 824UA

Equivalent # of Bays 24

Beam Tilt below horizontal .5 Degrees.

Horizontal Effective Radiated Power = 30.6 kW

Vertical Effective Radiated Power = 3.06 kW

Center of Radiation = 354 Meters amsl.

Ground Elev. at tower base = 268 meters amsl.

Power Density Values at 2 meters above ground plane.

	METERS																					
0	20	40	60	80	100	120	140	160	180	200	220	240										
	<	<	<	<	1	1	1	1	1	1	1	1	<	<	<	<	<	<				
20	<	<	<	1	1	1	1	1	1	1	1	1	1	1	1	<	<	<	<			
	<	<	<	1	1	1	1	1	1	1	1	1	1	1	1	1	<	<	<			
40	<	<	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	<	<		
	<	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	<		
60	<	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	<	
	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	
80	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	
	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
100	1	1	1	1	1	1	1	1	1	2	1	1	1	1	1	1	1	1	1	1	1	
	1	1	1	1	1	1	1	1	1	3	2	3	1	1	1	1	1	1	1	1	1	
120	1	1	1	1	1	1	1	1	2	2	x	2	2	1	1	1	1	1	1	1	1	
	1	1	1	1	1	1	1	1	1	3	2	3	1	1	1	1	1	1	1	1	1	
140	1	1	1	1	1	1	1	1	1	2	1	1	1	1	1	1	1	1	1	1	1	
	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
160	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	
	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	
180	<	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	<
	<	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	<
200	<	<	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	<
	<	<	<	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	<
220	<	<	<	<	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	<
	<	<	<	<	<	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	<	<
240	<	<	<	<	<	<	<	1	1	1	1	1	1	1	1	1	1	1	1	1	<	<

microwatts/sq. cm. at 270 meters amsl.

NOTE: < Indicates Power Density less than 0.5 microwatts/sq. cm.

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